

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

FILED

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CLERK OF DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

Larry Dean THOMAS Jr.,

Defendant.

Case No.: *d*

COMPLAINT FOR VIOLATIONS OF

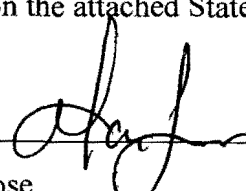
Title 18, U.S.C. §1591(a) and (b)-
Sex Trafficking of a Minor and by
Force, Fraud and Coercion

12113944

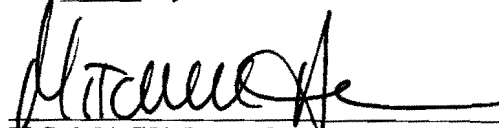
The undersigned complainant being duly sworn states:

On or about October 24th, 2012 within the Southern District of California, defendant Larry Dean THOMAS Jr. knowingly, in and affecting interstate commerce, did recruit, entice, harbor, transport, provide, obtain, and maintain by any means a person, to wit: Minor Female (MF), knowing and in reckless disregard of the fact that MF: (1) would be caused to engage in a commercial sex act; and (2) having had a reasonable opportunity to observe MF and knowing and in reckless disregard of the fact that MF had not attained the age of 18 years; in violation of Title 18, United States Code, Sections 1591(a) and (b).

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.


Marc Jose
Special Deputy U.S. Marshal

Sworn to before me and subscribed in my presence, this 25 day of October 2012.


U.S. MAGISTRATE JUDGE

D.A. 10/24/12

MS

PROBABLE CAUSE STATEMENT

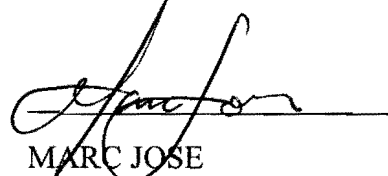
On November 22nd, 2011, MF ran away from her home in Virginia. Her mother reported her missing to the Virginia Beach Police Department. MF went to San Diego in March of 2012 to live with her grandmother. In June of 2012 MF ran away from her grandmother's home. Her grandmother did not report MF missing however she was still reported as a missing juvenile out of Virginia. MF began working for a pimp until he began physically beating her. In October of 2012, MF wanted to leave this pimp. MF began texting Larry Dean Thomas Jr. on the social website "DateHookUp". Shortly after, Thomas and MF met each other in person in San Diego. Thomas told MF she was now working for him. Thomas bought MF clothes and provided her with a house to stay at in San Diego where he introduced her to another prostitute named Patricia White. White took photographs of MF and used the photographs to post ads of her on the internet website Backpage.com. The ads were listed in the adult/escort section of the website. Thomas gave MF several instructions on how to work as a prostitute. Thomas told her not to date or talk to other black men and to always use condoms. Thomas also instructed her to have the dates send a photograph of themselves so he could screen them first. Approximately two weeks ago MF was on her period. Thomas instructed her to stuff medical gauze pads in her vagina to stop the bleeding so she could keep working. Several days after working in this condition MF began to have vaginal pain. Thomas brought her to Kaiser Hospital for help however when the nurses began to ask questions about her age and wanted to notify her parents of her condition Thomas took her from the hospital and continued to have her work for him.

On October 16th, 2012 MF's uncle reported to San Diego Police that he had discovered the escort ads of MF on Backpage and that she had run away from her grandmother's house. On October 24th, 2012, San Diego Police Detective V. Bales received this information. He contacted the grandmother of MF who confirmed that MF had run away again and her cell phone. Detective Bales checked Backpage and found an ad, #11776975, for MF which listed the same phone number. I was informed of this case and San Diego Police Detective E. Drilling called the ad and arranged to have MF meet him at room #37 of the Main Street Hotel located at

1 3494 Main Street in San Diego, for a date. Other detectives and I set up around the area of the
2 Main Street Hotel for surveillance. At approximately 1750 hours a black Dodge Charger
3 dropped off a female near the hotel at Thor Street and 3500 Dalbergia and then left the area. I
4 saw that the driver of the black Charger was a black male with dreadlocks.

5 The female who exited the black Charger walked to room #37 and met with Detective
6 Drilling. After Detective Drilling obtained a verbal agreement for a sexual act for money she
7 was arrested for prostitution and was identified as MF. In her possession was a cell phone.
8 Detective Drilling looked in the message log of the cell phone and determined there were several
9 messages indicative to pimping and prostitution between MF and a contact listed as "Kim".
10 Detective Drilling used the cell phone to portray himself as MF by sending a text message to
11 Kim saying the date wanted anal sex. Kim replied by giving the instruction to charge him \$300
12 for the anal sex. After approximately 20 minutes, Detective Drilling sent another message to Kim
13 saying the date was done. MF told Detective Drilling that she was instructed by Thomas that he
14 would pick her up at the same place he dropped her off at. At approximately 1845 hours the
15 black Dodge Charger returned and parked on 3500 Dalbergia where patrol officers stopped him.
16 I saw that the driver of the Dodge Charger was the same black male with dreadlocks that
17 dropped off MF earlier. The driver was arrested and identified as Larry Dean Thomas Jr. In
18 Thomas' pants pocket was the California driver's license and Social Security card for MF.

19 Thomas was transported to San Diego Police Headquarters. Detective Bales admonished
20 Thomas who stated that he knew MF was working as prostitute and he drove her to her dates and
21 was her protection. Thomas said that just before he dropped MF off at the hotel she gave him
22 her ID cards and told him she was 17 years old. Thomas said that he would get paid 50% of the
23 money MF made as a prostitute for driving her to dates. Thomas also admitted to getting a
24 prepaid credit card that was used to post ads of MF on Backpage and that he had sent the
25 message to charge \$300 for anal sex to MF's cell phone.

26
27 
28 MARC JOSE

29 Special Deputy U.S. Marshal